

# Exhibit T



1600 Wilson Boulevard, Suite 700  
Arlington, VA 22209  
703.243.9423  
www.consovoymccarthy.com

April 5, 2024

**VIA EMAIL**

Joshua E. Gardner  
U.S. Department of Justice

**Re: Notice of Incomplete Data and Renewed Data Request**

Dear Joshua:

Per the parties' ongoing discussions, SFFA has continued to review the individual-level admissions data productions to date. We write to bring your attention to several data fields that were produced for some class years but not others or were omitted from previous productions entirely. In certain cases, the fields identified below may have analogues in other parts of the data but are not fully captured in those places—to avoid confusion, we specify where this is the case. Please produce the data described below as soon as possible and, to the extent feasible, specify a date by which production will be complete.

*Empty Fields in USNA-00005461-65*

The following fields are included in the DOJ Application files in the March 4 production but are missing data for certain class years:

- Request Exam Date: this data was provided for 2027 but not for 2023-2026. *See* USNA-00005461 (2027); USNA-00005462-5465 (2023-2026). We also note that only forty percent of the cells for 2027 contain data.
- Qualified Medical Date: this data was provided for 2027 but not for 2023-2026. *See* USNA-00005461 (2027); USNA-00005462-5465 (2023-2026). We also note that only thirty percent of the cells for 2027 contain data.
- Withdraw Date: this data was provided for 2026 and 2027 but not for 2023-2025. *See* USNA-00005461-62 (2026 and 2027); USNA00005463-65 (2023-2025).
- Application Submit Date: this data was provided for 2025, 2026, and 2027 but not for 2023 and 2024. *See* USNA-00005461-63 (2025-2027); USNA00005464-65 (2023-2024). We also note that only forty percent of the cells for each year from 2025-2027 contain data.
- Decision Deadline: this data was provided for 2026 and 2027 but not for 2023-2025. *See* USNA-00005461-62 (2026 and 2027); USNA00005463-65 (2023-2025).

*Empty Fields in Oracle Production*

The Delta ECA fields are included in the General Information Part 1 files from the legacy Oracle database that were produced on February 28, but they contain no data for 2023 or 2024. *See* USNA-00003548 (2023); USNA-00003536 (2024).

*Omitted Fields in Oracle Production*

The following fields appear in the AIS data dictionary for the legacy Oracle database (USNA-00000498) but were not included in any of your previous productions:

- Qualified Alternate Standing (We recognize that you have provided QA lists as part of the broader document production, *e.g.*, USNA-00003455, but those lists provide only a snapshot in time and capture potentially different information than values listed in the legacy Oracle data dictionary.)
- Nomination Request
- Representative Nom Request
- Senatorial Nom Request
- VP Nom Request
- Presidential Nom Request
- Other Nom Request
- Allowed Nbr.
- Delta RSO
- Qualified Scholastic Date
- Zip Code
- Predicted QPR
- Probation Expulsion (We note that this field is included in the BART productions. *See, e.g.*, USNA-00003563.)
- Recommend HS Counselor (We recognize that there is also a field titled “Counselor Remarks,” but the written content in that field appears to be different from the single character value (E, S, W, or D) input in the Recommend HS Counselor field.)
- Foundation Offer Status (We recognize that this information is partially reflected in places like the Slate Review files, but this field contains ten unique values that are specific to the Foundation offer process and not adequately reflected elsewhere.)
- NAPS Offer Status (We recognize that this information is partially reflected in other places, but we request this field in particular for the same reasons described in Foundation Offer Status.)

*Empty Fields in BART Production*

The following fields appear in the Board Routing files included in the BART production on February 22 but either contain data only for certain years or are entirely empty across all years:

- Exerts Maximum Effort: this data was provided in the Recommendations Part 3 (Military) files for 2026 and 2027 but not for 2025. *See* USNA00005431-32 (2026-2027); USNA-00005433 (2025).

- Recommended Offer Status: this field is included in the Board Routing documents but does not contain data for 2025-2027.
- Class Rank Type: this field is included in Recommendations Part 1 (Academic) files for 2025-2027 but none of the fields contain any data. *See* USNA-00005437-39.

*Omitted Fields in BART Production*

The following fields appear in the AIS data dictionary for the BART database (USNA-00000499) but were not included in any of your previous productions:

- Application Complete Date (located in Application tab)
- Application Decision Date (located in Application tab)
- Body Fat Assessment (located in Application tab)
- Body Measurement Exam Date (located in Application tab)
- Special LOA Instructions (located in Application tab)
- Body Measurement Exam Date (located in Application tab)
- Medical Exam Status Date (located in Application tab)
- Medical Condition (located in Application tab)
- DoDMERB Update Date (located in Application tab)
- Qualified Scholastic Date (located in Application tab)
- Qualified Alternate Standing (located in Application tab)
- Nbr Available Vacancies (located in Account tab)
- Appointment Source Category (located in Contact tab)
- Financial Aid Applicant (located in Contact tab)
- IPEDS Ethnicities (located in Contact tab)
- IPEDS Hispanic (located in Contact tab)
- Only One Guardian (located in Contact tab)
- Raw Multiple (located in Multiples tab)

*Key Dates in Decision Process*

During our March 22nd conversation, you stated that you were uncertain whether the Academy tracks or retains data regarding the specific dates when it decides to admit a candidate, reject a candidate, offer a candidate a LOA, or offer a candidate a position on the waitlist. You also committed to confirming or denying whether that data is in the Academy's possession. If the Academy does possess this data, please provide it. If the data is no longer in the Academy's possession, please confirm that in writing when you provide the data fields listed above.

Again, please produce the data described above as soon as possible and, to the extent feasible, specify a date by which production will be complete.

Sincerely,

/s/ Thomas McCarthy  
Thomas McCarthy